

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**THE LINCOLN ELECTRIC COMPANY and  
LINCOLN GLOBAL, INC.,**

**Plaintiffs,**

**v.**

**THE ESAB GROUP, INC. and  
ESAB AB,**

**Defendants.**

**Civil Action No. 2:15-CV-1404**

**JOINT MOTION TO STAY ALL DEADLINES AND  
NOTICE OF SIGNED SETTLEMENT AGREEMENT**

Plaintiffs, The Lincoln Electric Company and Lincoln Global, Inc. (“Plaintiffs”), and Defendants, The ESAB Group, Inc. and ESAB AB (“Defendants”), file this Joint Motion to Stay All Deadlines and Notice of Signed Settlement Agreement. The parties hereby notify the Court that the parties have completed and signed a definitive Settlement Agreement conditioned upon the Court’s entry of an agreed Consent Judgment and Injunction.

Under the Court’s current Order Granting Motion to Stay All Deadlines (ECF No. 153), the parties are required to file dismissal papers by January 7, 2017, or appear for a status hearing before the Court at 9:00 a.m. on Monday, January 9, 2017. The signed Settlement Agreement provides for the Court’s entry of the agreed Consent Judgment and Injunction filed concurrently herewith as Exhibit 1 to the parties’ Joint Motion for Entry of Consent Judgment and Injunction, and provides Defendants up to and including January 29, 2017, to pay the agreed settlement fee.

The parties thus respectfully request that the Court stay, continue, or extend all unreachd case deadlines applicable between Plaintiffs and Defendants—including the January 7, 2017

deadline to file dismissal papers and the January 9, 2017 status conference—through January 31, 2017, so that the Court may enter the Consent Judgment and Injunction and ESAB can make payment under the terms of the signed settlement agreement.

Dated: January 6, 2017

Respectfully submitted,

/s/ William D. McSpadden

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**ATTORNEYS FOR DEFENDANTS,  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that on January 6, 2017, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(a)(3). Any other counsel of record will be served by a facsimile transmission and/or first class mail.

/s/ William D. McSpadden

William D. McSpadden